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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

VICTOR ZERMENO,  
MATTHEW MENDEZ,  
MIGUEL BARRAGAN,  
JONATHAN MALDONADO,  
EZEQUIEL GUZMAN,  
VICTOR DIAZ,  
FRANCISCO DIAZ,  
EDUARDO AMEZCUA,  
MICHAEL NERI,  
ALEJANDRO HAWKINS,  
FRANCISCO FERMAN,  
IVAN HERNANDEZ,  
JORGE DELORES CRUZ

Defendants.

CASE NO. 1:23-CR-00115-ADA-BAM

STIPULATION REGARDING DISCOVERY;  
FINDINGS AND PROTECTIVE ORDER

**STIPULATION**

1. The discovery in the above-mentioned case includes thousands of pages of police reports, photographs, records, and search warrant affidavits that contain Personal Identifying Information of the

defendants, other targets of the investigation, and non-targets of the investigation.

2. The government will make best efforts to redact from the discovery personal identifying information of parties, such as social security numbers, driver's license numbers, etc.

3. The parties and defense counsel, including but not limited to defense counsel's staff, investigators, and outside assistants, shall not disclose the contents of the documents released by the government through discovery in this case, except as necessary for investigative work for the prosecution or presentation of defenses in this case. Although defense counsel may review discovery items with their clients, to protect the personal identifying information that may be contained in the discovery, no copies of documents, tape-recordings, or other items released by the government in discovery in this case may be given to the defendant or any third party who is not a member of defense counsel's staff or hired as defense investigators or outside assistants, including relatives or friends of the defendant, unless such items have been redacted to protect the personal identifying information.

4. Rule 16(d)(1) of the Federal Rules of Criminal Procedure provides that the "court may, for good cause, deny, restrict, or defer discovery, or inspection, or grant other appropriate relief."

IT IS SO STIPULATED.

Dated: October 25, 2023

PHILLIP A. TALBERT  
United States Attorney

/s/ ANTONIO J. PATACA  
ANTONIO J. PATACA  
Assistant United States Attorney

Dated: October 25, 2023

/s/ ERNEST S. KINNEY  
ERNEST S. KINNEY  
Counsel for Defendant  
Victor Diaz

**ORDER**

IT IS SO ORDERED.

Dated: October 26, 2023

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE